

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

UNITED STATES DISTRICT COURT

JAN 21 2020

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Adriana Yannete VILLARREAL, YOB: 1997, COC: US  
Jennifer Selena LANDA, YOB: 1993, COC: US

Case No. M-20-0153-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 20, 2020 in the county of Brooks in the  
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 841

Offense Description

Knowingly and intentionally possess with the intent to distribute approximately  
52.78 kilograms of Methamphetamine, Schedule II controlled substance.

This criminal complaint is based on these facts:

✓ Continued on the attached sheet.

Approved by ANSA S. DIPIAZZA

*AS DiPiazza*

Sworn to before me and signed in my presence.

Date: 1/21/2020 -9:10am.

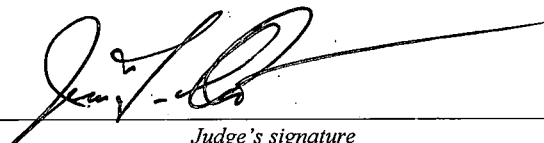
City and state: McAllen, Texas



Complainant's signature

Gerardo Mercado, HSI Special Agent

Printed name and title



Judge's signature

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

## ATTACHMENT A

- I. On January 20, 2020, at approximately 10:20 a.m., U.S. Border Patrol Agents (BPAs) encountered Adriana Yannete VILLARREAL and Jennifer Selena LANDA, both United States citizens, in a blue Ford Explorer (hereinafter referred to as "Subject Vehicle") as they presented themselves for an immigration inspection at the U.S. Border Patrol Checkpoint on U.S. Highway 281 near Falfurrias, Texas. VILLARREAL was driving the Subject Vehicle and LANDA the front passenger of the Subject Vehicle.
- II. At the primary inspection area, VILLARREAL advised the inspecting BPAs that they were traveling from Mission, Texas and intended to stay in Houston, Texas for a few days. BPAs noticed that VILLARREAL and LANDA were traveling with no luggage and the inside of the Subject Vehicle appeared to be completely empty. VILLARREAL granted BPAs consent to search the Subject Vehicle. BPAs referred VILLARREAL and LANDA to secondary inspection for further inspection.
- III. At the secondary inspection area, BPAs conducted an inspection of the Subject Vehicle utilizing a fiber optic scope and a non-intrusive technology equipment and identified anomalies to the fuel tank area within the Subject Vehicle. Subsequently, BPAs field tested the liquid substance with signs of crystallization discovered within the fuel tank which yielded positive for characteristics of methamphetamine. BPAs extracted the liquid methamphetamine, weighing approximately 52.78 kilograms, concealed within the fuel tank of the Subject Vehicle.
- IV. In a post-Miranda interview, VILLARREAL and LANDA admitted to Homeland Security Investigations (HSI) Special Agents (SAs) and BPAs that they had recently accepted an offer by an individual to transport the Subject Vehicle from Reynosa, Mexico to Houston, Texas. VILLARREAL and LANDA admitted that on January 19, 2020, they travelled to Reynosa, Mexico, returned to the United States, and delivered the Subject Vehicle to said individual at a gas station in McAllen, Texas. On January 20, 2020, VILLARREAL and LANDA were instructed by said individual to pick up the Subject Vehicle at a residence in Mission, Texas and transport the Subject Vehicle to an unknown location in Houston, Texas. VILLARREAL and LANDA admitted they were aware that said individual was involved with illicit activities and they were concerned the Subject Vehicle may have been loaded with narcotics due to the unusual payment amount and the overall totality of the circumstances. VILLARREAL and LANDA claimed that due to their concerns they even searched the Subject Vehicle for narcotics but did not find any narcotics. VILLARREAL and LANDA claimed they did not intend to transport narcotics and were assured by said individual that the Subject Vehicle was not loaded with contraband. VILLARREAL stated she had a "bad

feeling” the Subject Vehicle was loaded with narcotics but accepted the offer because she needed to money. VILLARREAL stated she was promised approximately \$700.00 USD to transport the Subject Vehicle from Reynosa, Mexico to Houston, Texas and planned to split her earnings with LANDA. VILLARREAL claimed said individual told her the Subject Vehicle would be utilized to smuggle illegal aliens to and from Houston, Texas. VILLAREAL stated that they were not actually going to stay in Houston and that they were going to return immediately by bus.

- V. HSI SAs conducted a law enforcement database inquiry and confirmed that on January 19, 2020, at approximately 10:25 p.m., VILLARREAL and LANDA crossed the Subject Vehicle from Mexico into the United States via the Rio Grande City, Texas Port of Entry.